

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

**PLAINTIFF'S SPECIAL INTERROGATORIES TO DEFENDANT
VOICE SIGNAL TECHNOLOGIES, INC.**

Pursuant to Fed. R. Civ. P. 33, the Local Rules of the District of Massachusetts, and this Court's Order granting Plaintiff's Motion for Remedies for Violation of Protective Order, ScanSoft, Inc. requests that Voice Signal Technologies, Inc. answer separately and fully, in writing and under oath, by December 1, 2004, each of the interrogatories set forth below.

DEFINITIONS

ScanSoft hereby fully incorporates by reference the definitions included in Plaintiff's First Set of Interrogatories to Defendant Voice Signal Technologies, Inc., dated May 26, 2004. Additionally, as used herein, the term "counsel" and "counsel's firm" refers to the law firm of Choate, Hall & Stewart and any and all individuals employed by Choate, Hall & Stewart.

INSTRUCTIONS

ScanSoft hereby fully incorporates by reference the instructions included in Plaintiff's First Set of Interrogatories to Defendant Voice Signal Technologies, Inc., dated May 26, 2004.

INTERROGATORIES

1. Identify each and every step taken with respect to the documents ScanSoft produced on August 9, 2004, including, but not limited to, the receipt of the documents, where they were placed, how they were stored, who had access to them, what steps were taken to review the documents, who reviewed the documents, whether one or more group of documents was selected from the larger group of documents produced, the reasons for such selection, whether copies of the documents, or of selected groups, were made and for what purpose, who received copies of the documents or of selected groups of documents, who was responsible for compliance with the requirements of the protective order in this case, what steps were taken to comply with the protective order in this case, whether any database or index of the documents produced has been made, what documents were copied and produced to Mr. Cohen, what documents were copied and produced to any other person at Voice Signal, what documents were scanned for electronic reading and copying.

2. Identify each and every step taken in assembling and delivering to Mr. Cohen the highly confidential documents listed in the November 22, 2004 Popeo letter, and any other documents delivered to Mr. Cohen.

3. State when Mr. Cohen received the documents, who at Voice Signal had access to the documents, what was done with the documents at Voice Signal, and when and how the documents listed in the in the November 22, 2004 Popeo letter were returned by Mr. Cohen to counsel.

4. Identify each and every communication, whether written or oral letter, e-mail, correspondence, note, memorandum or other document that relates to the treatment of the documents produced by ScanSoft in this litigation.

5. Identify each and every person at counsel's firm, Choate, Hall & Stewart, who had any responsibility for or involvement in the receipt, maintenance, review, culling, copying, analysis, distribution or delivery of all or any portion of the documents produced by ScanSoft and state what their involvement was.

6. Identify each and every communication whether written or oral, letter, correspondence, e-mail, memorandum, note, or other document authored, drafted, created or produced by counsel or by Mr. Cohen or by anyone else at Voice Signal, which in any way discusses or relates to the content of the highly confidential documents identified in the November 22, 2004 Popeo letter or marked highly confidential or marked confidential or otherwise.

Dated: November 24, 2004

SCANSOFT, INC.,

By its attorneys,

/s/ Lisa M. Fleming

Lee Carl Bromberg, BBO #058480

Robert Asher, BBO #022865

Julia Huston BBO #562160

Lisa M. Fleming, BBO #546148

Jack C. Schechter, BBO #652349

BROMBERG & SUNSTEIN LLP

125 Summer Street

Boston, Massachusetts 02110-1618

(617) 443-9292